

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION**

IN RE:	CASE NO. 12-12626
Hazel M. Lawson	CHAPTER 13
Debtor.	JUDGE Robert E. Grant

**MOTION FOR RELIEF FROM AUTOMATIC STAY AND ABANDONMENT AS TO
2007 KIA SPECTRA - VIN KNAFE121775430805**

Now comes, Americredit Financial Services, Inc. dba GM Financial ('Movant'), by and through counsel, and moves pursuant to 11 USC §362 for an Order terminating the automatic stay with respect to certain property owned by the Debtor(s) in which Movant has a security interest. In support of this Motion, Movant states as follows:

1. On August 8, 2012, Hazel M. Lawson ('Debtor') for relief under Chapter 13 of the Bankruptcy Code.
2. Movant is the holder of a secured claim with an outstanding secured amount as of May 57, 2015 of \$2799.62. Said claim is secured by the property known as 2007 KIA SPECTRA - VIN KNAFE121775430805 ('Property').
3. The Property was considered a Total Loss as of April 26, 2015, per Geico Insurance Claim #XXXXXXXXXXXX1041 and the settlement available is \$4082.81, which exceeds the claim balance. Creditor wishes to retain and apply insurance proceeds to the account to be able to dispose of the vehicle.
4. Movant will suffer irreparable injury, harm and further damage should it be delayed in taking possession and the liquidating of its Property.
5. Movant contends that sufficient grounds exist to waive the requirement of Bankruptcy Rule 4001(a)(3), therefore allowing an Order to be effective upon this Honorable Court's Signature.

WHEREFORE, Americredit Financial Services, Inc. dba GM Financial requests this Court terminate the automatic stay with regard to the Property known as 2007 KIA SPECTRA - VIN KNAFE121775430805 to enable Movant to enforce its state law remedies and for all other relief as is just.

Respectfully Submitted,

/s/ D. Anthony Sottile
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing has been duly electronically noticed or via U.S. First Class Mail, postage prepaid on May 5, 2015 to the following:

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All Creditors on Attached Matrix

/s/ D. Anthony Sottile
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